

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	19-11389
Letitia Bates)		
)	Chapter:	Chapter 13
Debtor)		
)	Judge:	Timothy A. Barnes

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on July 2, 2020 at 1:30 PM, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the Debtor's Motion to Obtain Credit and Shorten Notice, a copy of which is attached

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.Court-Solutions.com or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Dale Allen Riley

Dale Allen Riley
Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
312.332.1800
ndil@geracilaw.com

CERTIFICATE OF SERVICE

I, Dale Allen Riley, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on June 26, 2020 at 2:21 PM.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	19-11389
Letitia Bates)	Chapter:	Chapter 13
)	Judge:	Timothy A. Barnes
Debtor)		

LIST OF PARTIES SERVED

Marilyn O. Marshall, 224 S. Michigan Ave. #800 , Chicago, IL 60604

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Letitia Paris Bates, 8427 S Drexel 3N, Chicago, IL 60619

[See attached list]

Americash

Minocqua WI 54548

City of Chicago Bureau Parking
Bankruptcy Dept/City Clerk
121 N. LaSalle St
Room 107
Chicago IL 60602

Arnold Scott Harris PC
Bankruptcy Dept.
111 W Jackson Blvd Ste 600
Chicago IL 60604

CNAC
Bankruptcy Dept
2345 W Jefferson St
Joliet IL 60435

Commonwealth Edison
Attn: System Credit/BK Dept
3 Lincoln Center 4th Floor
Oakbrook Terrace IL 60181

Credit One Bank NA
Attn: Bankruptcy Dept.
Po Box 98875
Las Vegas NV 89193

ECMC
Bankruptcy Dept
PO Box 16408
Saint Paul MN 55116

First Premier BANK
Attn: Bankruptcy Dept.
601 S Minnesota Ave
Sioux Falls SD 57104

Illinois Department of Revenue
Bankruptcy Department
PO Box 64338
Chicago IL 60664-0338

Illinois Dept of Human Services
Bankruptcy Dept
100 South Grand Avenue East
Springfield IL 62762

MCOA/Village of Alsip
C/O Muncipal Collections of America
Inc
3348 Ridge Rd
Lansing IL 60438

MCOA/Village of East Hazel Crest
C/O Muncipal Collections of America
Inc
3348 Ridge Rd
Lansing IL 60438

Medicredit, INC
Attn: Bankruptcy Dept.
Po Box 1629
Maryland Heights MO 63043

Niizhwaaswi LLC
PO Box 1193
Minocqua WI 54548

IN THE UNITED STATES OF BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No:	19-11389
Letitia Bates)		
Debtor,)	Chapter:	Chapter 13
)		
)	Judge:	Timothy A. Barnes

MOTION TO OBTAIN POSTPETITION CREDIT AND SHORTEN NOTICE

NOW COMES the Debtors, Ms. Letitia Bates (the "Debtor"), by and through her attorneys, Geraci Law LLC, to present her **MOTION TO OBTAIN POSTPETITION CREDIT AND SHORTEN NOTICE**, and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 04/19/2019.
3. The Debtor now seeks to purchase a used vehicle to replace her 2007 Ford Explorer which is no longer operable.
4. The Debtor wishes to purchase a 2016 Ford Edge at 72 payments of \$652.64 with an annual percentage rate of 19.99% for a total financed amount of \$27,032.25. See Exhibit A for a copy of the proposed contract.
5. The Debtor's budget reflects that she can afford to make the payments on the proposed vehicle loan while retaining the dividend to the unsecured creditors. See Exhibit B for an amended budget.

6. Because the Debtor's vehicle is mandatory for her to maintain her employment and without her employment the Debtor's Chapter 13 Plan is at risk of failure the Debtor respectfully requests that this Court hear her request on shortened notice.

WHEREFORE the Debtor, Ms. Letitia Bates, prays that this Court enter an order permitting her to obtain post-petition credit, shortening notice to that given and for such further additional relief that this Court may deem just and proper.

/s/ Dale Allen Riley
Dale Allen Riley

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960